

JACOB LAUFER, P.C.
65 BROADWAY
SUITE 1005
NEW YORK, NEW YORK 10006

JACOB LAUFER*

SHULAMIS PELTZ
MARK ELLIS
AKIVA GOLDBERG

TELEPHONE (212) 422-8500

FAX (212) 422-9038

* Also admitted in the District of Columbia

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VIA ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

Re: United States v. Simon Goldbrener, et al., 18 Cr. 614 (KMK)

Dear Judge Karas:

We represent Simon Goldbrener in the above-captioned matter. In accordance with the Court's Individual Rule of Practice for Sentencing Proceedings, Fed.R.Crim.P. 49.1(e)(1), and the Court's Order in connection with our prior request for sealing, we respectfully make this application to redact information from Mr. Goldbrener's Sentencing Memorandum and its exhibits that address sensitive information.

We note in particular that people who have written to the Court on Mr. Goldbrener's behalf, report details of highly sensitive personal matters in which he has assisted them. *See Under Seal v. Under Seal*, 273 F.Supp.3d 460, 467 (S.D.N.Y. 2017) ("A party may overcome the presumption of access by demonstrating that sealing will further other substantial interests such as a third party's person privacy interests . . .") *citing United States v. Aref*, 533 F.3d 72, 83 (2nd Cir. 2008). We have, as directed by the Court, sought to limit redactions to sensitive personal details.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Jacob Laufer
JACOB LAUFER

cc: A.U.S.A. Michael Maimin, Vladislav Vainberg, Hagan Scotten (Via ECF)